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State of Utah

DEPARTMENT OF NATURAL RESOURCES

MICHAEL R. STYLER
Executive Director

Division of Oil, Gas and Mining

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Division Director

March 23, 2015

Mike Dalley
Staker Parsons Companies
89 West 13490 South, Suite 100
Draper, Utah 84020

Subject: Ninth Review of Notice of Intention to Commence Large Mining Operations, Staker Parsons Companies, Beef Hollow Facility, M/035/0042, Salt Lake County, Utah

Dear Mr. Parsons:

On about March 23, 2015, the Division of Oil, Gas and Mining sent a review of the Beef Hollow Notice of Intention to Commence Large Mining Operations (NOI), which was received March 11, 2015. The Division inadvertently sent a draft copy of this review. Attached is the review that should have been sent. I apologize for this error.

The attached comments will need to be addressed before tentative approval may be granted. Please submit your response no later than May 15, 2015.

The current reclamation surety is in the form of two corporate surety bonds totaling \$1,170,480.00, but the reclamation cost estimate in the NOI is \$3,144,000.00. The cost estimate may change when the NOI is finalized, but as an interim measure, please submit the increased surety amount of \$1,973,520.00 by April 15, 2015. Please contact Penny Berry at 801-538-5291 if you need assistance submitting the surety.

Several of the comments in this review were not addressed or only partially addressed. Please contact the Division to arrange a meeting to discuss these issues if you do not understand or disagree with the comments.

Please contact Leslie Heppler at 801-538-5257, Peter Brinton at 801-538-5258 or me at 801-538-5261 if you have any questions about the review. Thank you for your cooperation in completing this permitting action.

Sincerely,

Paul B. Baker
Minerals Program Manager

PBB:lah:mj
Attachment: Review
cc City of Herriman
O:\M035-SaltLake\M0350042-BeefHollowFacility\final\REV9-6517-03182015pnb.doc



**NINTH REVIEW OF NOTICE OF INTENTION
TO COMMENCE LARGE MINING OPERATIONS**

**Staker Parsons Company
Beef Hollow Mine
M/035/0042
March 23, 2015**

General Comments:

Comment #	Sheet/Page/Map/Table #	Comments	Initials	Review Action
1	General	(No response needed.) The Division may have additional comments based on submittals received in the future.	lah	
2	General	Please submit good quality color copies on the final revision. The Division needs color pages for the photos and maps in Appendices A, D, and F.	lah	
3	Appendix H	Redline and strikeout will not be needed in the final document.	lah	
4	Appendix	A vegetation survey is now in Appendix D, but the text on page 17 refers to Appendix F. Please change the letter "F" to the letter "D." and include the proper reference in the table of contents. This comment was included in the previous review but has not been addressed.	lah	

R647-4-105 - Maps, Drawings & Photographs

105.3 - Drawings or Cross Sections (slopes, roads, pads, etc.)

5	Figure 8	<p>Please identify the following on Figure 8:</p> <ul style="list-style-type: none"> - any ditches adjacent to the highway, - berms and ditches such as those shown along the road in the SWPPP, mining, and permit boundaries in the outdated SWPPP), - berms and ditches at permit boundaries, like those shown in the SWPPP (Section 109.4 states that stormwater flowing onto the site will be channeled to existing drainages), - the roads within the permit boundaries, - the locations of fuel storage and other potentially deleterious materials, - the Jordan Valley Water Treatment Plant, and - the canal just below the treatment plant. <p>This comments was included in a previous review but has not been addressed.</p>	pnb	
6	Figure 8	Without seeing the calculations and more detail, it appears that the sediment basin for the largest stream channel (originating on the Camp Williams property) may be smaller than it should be, when compared to the other sediment basins and the watershed sizes. Determine whether this is the case and correct the map accordingly. This comment was included in a previous review and has not been adequately addressed. It will need to be re-evaluated once the contributing area is adequately shown and the acreage calculated.	pnb	
7	Figure 8	Please provide a topo map of the site to include the entire area contributing runoff to basin 6, which extends south and west of the current boundary. Identify the boundaries of all the contributing areas. The NOI includes a new topo map, but it does not include the entire area that would contribute runoff to basin 6, nor does it include a boundary for the contributing area.	pnb	

8	Figure 8	<p>The watershed boundary on the map for watershed 6 (Existing Drainage Basin 6)—which appears to include parts but not all of the watershed associated with the drainage from Camp Williams—doesn't match the acreage included in the table on the map. The Basin 6 watershed should be identified correctly. Feel free to call the Division to discuss. If values and coverage for the contributing area change as a result, calculations will need to be updated.</p> <p>The contributing area of Basin 6 should be significantly larger than reported on Figure 8, since the drainage extends miles offsite to the southeast on Camp Williams land. Also, the Basin 4 and 5 contributing areas should extend up the drainage past the proposed permit boundary, since the drainage area doesn't stop at the permit boundary. Stormwater design flows will need to be re-calculated using the revised contributing areas. Re-design the sediment basins, culverts, and other water diversion structures to consider the actual drainage basin areas. See comment regarding design storms below. The footprint of sediment basins on the map should be consistent with their volumes.</p> <p>These comments were included in previous reviews but have not been addressed.</p>	pnb	
9	Figure 8	Please provide a design flow for Basin 6. This comment was included in a previous review but has not been addressed. A larger storm size from an elevation farther up the Basin 6 contributing area should be used.	pnb	
10	Figure 9	Any post-reclamation road should be clearly identified. The culvert size should be consistent with the Basin 6 design flow. If this culvert size is the same as the size of the culvert beneath the Mountain View Corridor highway, then the Division will accept it as being appropriate after reclamation. See Section 110.3. If this road is to be reclaimed, the original comment will need to be addressed in the reclamation cost calculations. The original comment was, "The final contours map (Figure 9) identifies the road along the south boundary as remaining after reclamation. Until an agreement has been reached regarding existing roads at the site, road reclamation will need to be included in the reclamation bond." These comments were included in previous reviews and have not been addressed.	pnb	
11	Figure 8	The Division requests that temporary water retention structures be designed to accommodate runoff from at least the 10-year, 24-hour storm event for this site, and recommends that structures be designed for larger storm events. The Division also recommends that any permanent water retention structures that will remain after reclamation be designed for at least a 100-year, 6-hour storm event with a suitable outfall design.	pnb	

R647-4-109 - Impact Assessment

109.3 – Soils

Comment #	Sheet/Page/Map/Table #	Comments	Initials	Review Action
12	Pg 26	The text says "Highwalls will be left no greater than 3H:1V" and final slopes not to exceed "3H:1," but the cross sections on Figures 10, 11 and 12 show 2H:1V slopes. Please correct this apparent discrepancy. This comment was included in the previous review and has not been addressed.	lah	

Ninth Review
Page 4 of 4
M/035/0042
March 23, 2015

R647-4-110 - Reclamation Plan

110.2 - Roads, highwalls, slopes, drainages, pits, etc., reclaimed

Comment #	Sheet/Page/Map/Table #	Comments	Initials	Review Action
13	Page 26	Permanent features (that will be retained after reclamation) should be specifically identified and discussed in section 110.3 (such as the road fill and culvert G, which will need to be hydrologically sound).	pnb	

113 – Surety

Comment #	Sheet/Page/Map/Table #	Comments	Initials	Review Action
15	Appendix G page1	The reclamation cost estimate summary sheet indicates the costs used were from 2012, but these costs are from 2014. This summary sheet also indicates the area bonded is 589 acres, but Figure 7 notes 410 acres for phase 1. Please make appropriate corrections and add the escalation year of 2019. This comment was included in the previous review but has not been addressed.	lah	